

EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE GOOGLE DIGITAL ADVERTISING
ANTITRUST LITIGATION

No. 21-MD-3010 (PKC)

This Document Relates to:
ALL ACTIONS

**DECLARATION OF [REDACTED] IN SUPPORT OF GOOGLE'S MEMORANDUM
OF LAW IN OPPOSITION TO PLAINTIFFS' MOTION FOR ORDER COMPELLING
PRODUCTION OF DOCUMENTS WITHHELD AS PRIVILEGED**

I, [REDACTED], pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am [REDACTED] at Google LLC. I have been employed by Google since January 2013 and have held my current position since 2016. During the period from January 2013 to 2016, I was employed by Google in the position of [REDACTED]
[REDACTED]

2. I have reviewed the document identified as GOOG-DOJ-08154428, which is a compilation of notes from Ads and Commerce Meetings ("ACM") from January 18, 2019, through January 31, 2020 (hereinafter "the Document").

3. I have personal knowledge of the meeting notes from June 28, 2019, on pages -468 to -469 of the Document, because I was the presenter on this topic at the meeting.

4. The first line of the redacted material on the top of page -469 in the Document describes the legal strategy of Google in-house counsel, including [REDACTED] ESQ, [REDACTED] ESQ, and [REDACTED] ESQ, regarding potential privacy law changes discussed at this meeting.

5. I submit this declaration in support of Google's Memorandum of Law in Opposition to Plaintiffs' Motion for Order Compelling Production of Documents Withheld as

Privileged in *In Re Google Digital Advertising Antitrust Litigation*, Case No. 21-MD-3010 (PKC) (S.D.N.Y.), filed on November 14, 2022.

6. The contents of this declaration are true and correct to the best of my knowledge, information, and belief, and are based on my personal knowledge of the Document. If called upon as a witness in this action, I could and would testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the

14 day of November, 2022, in Washington, DC

